

From: [Knittel, Janette](#)
To: [Tasya Gray](#)
Cc: [Pat Hsieh](#); [Trevor Louviere](#)
Subject: RE: comments on Round 91 and Pre-CMS baseline results
Date: Monday, September 27, 2021 12:25:00 PM

Thank you, makes sense. I'll pass it on to my team.
-Janette

From: Tasya Gray <ngray@dofnw.com>
Sent: Monday, September 27, 2021 10:22 AM
To: Knittel, Janette <Knittel.Janette@epa.gov>
Cc: Pat Hsieh <phsieh@dofnw.com>; Trevor Louviere <tlouviere@dofnw.com>
Subject: RE: comments on Round 91 and Pre-CMS baseline results

Hi Janette,

We looked into the field records and talked with sampling team for the 2 questions you posed. The other comments are helpful for consideration on next steps and production of future reports.

3. Please account for the longer than typical time to stabilize parameters during sampling of well B6.

All parameters stabilized after about 30 minutes except for turbidity, which continued to slowly drop, so the sampling team continued with purging until it fully stabilized. This well was redeveloped as part of the pre-CMS work plan and this was the first sampling event following redevelopment. Since this well had not been sampled in a long time we don't have a record of 'typical' behavior but with turbidity slowly dropping it was deemed prudent to let it settle at a stable value prior to sampling.

4. "wells located outside of barrier wall were sampled during the ebb tide" - Are wells inside the wall also sampled at a certain point in the tide?

Wells inside the barrier wall are not sampled at a specific time in the tidal cycle, as they do not show significant swings in groundwater elevation with tidal cycles like exterior wells do (which show fluctuations of 4-5 feet between high and low tides). This requirement is outlined in the Performance Monitoring Plan for the site (barrier wall).

Thanks,
Tasya

From: Knittel, Janette <Knittel.Janette@epa.gov>
Sent: Friday, September 10, 2021 8:50 AM
To: Tasya Gray <ngray@dofnw.com>
Subject: RE: comments on Round 91 and Pre-CMS baseline results

Tasya,
I should have said that I was providing these items only for your benefit as we think about what happens next – I'm not asking for responses or actions (although if you want to share your thoughts I

would certainly welcome them). We would however like answers to our questions in #3 and #4.

Thanks,
Janette

From: Tasya Gray <ngray@dofnw.com>
Sent: Thursday, September 09, 2021 4:15 PM
To: Knittel, Janette <Knittel.Janette@epa.gov>
Subject: RE: comments on Round 91 and Pre-CMS baseline results

Thanks Janette.
Tasya

From: Knittel, Janette <Knittel.Janette@epa.gov>
Sent: Thursday, September 9, 2021 4:09 PM
To: Tasya Gray <ngray@dofnw.com>
Subject: comments on Round 91 and Pre-CMS baseline results

Hi Tasya. In our check-in today I said I'd send you comments from my team regarding potential data gaps. We also have a couple of minor suggestions and questions.

-Janette

1. On Figure 12 of the Round 91 report, it would be helpful to highlight the results that exceed the PRGs.
2. The column showing locations of wells relative to the wall in Tables 3 and 4 is appreciated. It would be helpful if on the other tables the wells were differentiated to show locations inside vs outside the wall. For example, you could italicize wells that are inside the wall.
3. Please account for the longer than typical time to stabilize parameters during sampling of well B6.
4. "wells located outside of barrier wall were sampled during the ebb tide" - Are wells inside the wall also sampled at a certain point in the tide?
5. The April/May 2021 results from EX-3 show a copper PRG exceedance (17.1 ug/L), but also exceedances for aluminum and vanadium. April/May 2021 PRG exceedances of aluminum and/or vanadium were observed in wells along the northern and western wall extents in B1B, MW-49, MW-58, A2, MW-47, and MW-49. In April/May 2021, it doesn't look like we collected metals for wells between the wall and EX-3 (MW-22, EX-1, DM-4, DM-5), so it kind of seems like there's a data gap in this area for these other metals with PRGs. If I recall correctly, I think that the rationale for metals sampling locations was based on recent exceedances of copper. Suggest we look at the recent data for these wells to see if there are metals other than copper that had exceedances, and perhaps include some or all of these wells in a future sampling event for metals depending on what the recent data shows.
6. In April/May 2021, PCP was detected in the southwest corner of the site in MW-28 and MW-44. It's a bit of a curious result to me; PCP didn't previously exceed the PRG in the area around MW-44, the well that previously had high PCP concentrations (H-10 at >100x the PCP PRG) is now below the PRG, and I don't think we had recent PCP data near MW-28. We might

consider delineating PCP further by sampling nearby wells (e.g., MW-29, MW-53, MW-51, MW-41).

7. In April/May 2021, various SVOCs were detected in MW-44, EX-1, and B6 above the most conservative PRGs. If I recall correctly, I think that the rationale for SVOC sampling locations was based on recent exceedances of naphthalene and PCP. Suggest looking at the recent SVOC data for nearby wells (e.g., MW-51, MW-41, MW-53, MW-29, A2, MW-12, EX-3, and DM-5) that weren't sampled for SVOCs in April/May 2021 to see if there were recent PRG exceedances of SVOCs other than naphthalene or PCP, and perhaps include some or all of these wells in a future sampling event for SVOCs depending on what the recent data shows.
8. As you and I talked about today, we will be talking more later about the D/F detections and the shoreline area and its interface with the tideflats/LDW.
9. We also talked about the sheen/odor/suspected NAPL reported on the field sheets for H-10 and MW-12. Only xylene was detected at a low level in one well which indicates a heavier hydrocarbon could be present. Mineral oil was used in historic operations and has been detected in the past. We can look at that later as a possible data gap to address. And you mentioned looking at past NAPL field monitoring.

Janette Knittel

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